

# EXHIBIT 6

## Jeremy.Anapol

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**From:** Jeremy.Anapol  
**Sent:** Wednesday, July 20, 2022 8:16 AM  
**To:** Zhu, Li; Huang, Annie  
**Cc:** AmazonVsRPI; RK\_Dynamic; jpowers@hancocklaw.com; Mary L. D'Agostino  
**Subject:** RE: RPI v. Amazon

Li,

Thank you for the letter responding to my emails. Contrary to your letter, Amazon is not seeking expert opinion testimony from the professors. Amazon is seeking fact testimony. As I explained on our June 8 phone call, the professors have unique knowledge of relevant facts relating to issues such as enablement and damages. Many of these facts relate to the professors' own publications on natural language processing.

Each of the professors has published extensively on NLP. *E.g.*, S. Nirenburg & V. Raskin, *Ontological Semantics* (2004); T. Strzalkowski & S. Harabagiu (eds.), *Advances in Open-Domain Question Answering* (2006); M. McShane & S. Nirenburg, *Linguistics for the Age of AI* (2021). Their publications contain statements about what was known and what was not known in NLP at various relevant times, and Amazon is entitled to inquire about the factual basis for these statements, along with other facts known to the professors about their own NLP research and research they observed others conducting. All of this information is factual, not expert opinion.

Your argument that the professors were not employed at RPI at the time of the invention is immaterial. *Post*-invention facts are relevant to at least enablement under the *Wands* factors and damages under the *Georgia-Pacific* factors. And the professors' knowledge of the state of the art before the invention is also relevant, even if they did not work at RPI when they acquired that knowledge.

Your argument that the professors "hail from RPI's Cognitive Sciences department" also provides no basis to withhold the professors' testimony. That department describes itself as working on problems in Computer Science, and all of the professors undisputedly specialize in NLP. Although Dr. McShane has her Ph.D. in Slavic Languages, she has been working in NLP since before the invention, including as a professor of Computer Science and Electrical Engineering for many years.

Your argument that the information sought from the professors is unreasonably duplicative or more readily obtained elsewhere lacks merit also. Nobody else is better situated to testify about the factual basis for the statements in the professors' publications, or the facts surrounding the professors' own research efforts. Any knowledge that Amazon's expert might have regarding the state of the art would not encompass all of the same information known to the professors.

The 30(b)(6) deposition you propose is not an adequate substitute for the professors' testimony, and no authority requires Amazon to accept this inferior substitute. The designee will not have first-hand knowledge of the facts Amazon seeks (e.g., regarding the professors' publications and research efforts). Moreover, Dr. Hsu is biased because he has a strong financial incentive to give self-serving testimony in this case.

Finally, Plaintiffs still do not provide any specifics regarding the alleged burden on the professors. Nor do you explain why Dr. McShane's unidentified medical condition would interfere with a deposition, or propose any accommodations that would make the deposition more manageable for her.

We encourage Plaintiffs to reconsider their refusal to make the professors available for deposition. If Plaintiffs agree to make the professors available, please let us know by close of business on Friday, July 22.

Best regards,  
Jeremy

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**From:** Zhu, Li <LZhu@RobinsKaplan.com>  
**Sent:** Tuesday, July 19, 2022 4:19 PM  
**To:** Jeremy.Anapol <Jeremy.Anapol@knobbe.com>; Huang, Annie <AHuang@RobinsKaplan.com>  
**Cc:** AmazonVsRPI <AmazonVsRPI@knobbe.com>; RK\_Dynamic <RK\_Dynamic@RobinsKaplan.com>;  
jpowers@hancocklaw.com; Mary L. D'Agostino <mdagostino@hancocklaw.com>  
**Subject:** RE: RPI v. Amazon

Jeremy,

Please find the attached correspondence regarding Amazon's requested depositions.

Best,

**Li Zhu** | Partner  
**Robins Kaplan LLP** | Silicon Valley  
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T 650.784.4013 (CA) | F 612.339.4181 | [robinsskaplan.com](mailto:robinsskaplan.com)  
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**From:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>  
**Sent:** Friday, July 15, 2022 2:56 PM  
**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>  
**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>;  
[jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>  
**Subject:** [EXTERNAL] RE: RPI v. Amazon

Li,

We have not received a response to my email below. Please let us know if Plaintiffs plan to rely on any other facts regarding the alleged burden so we may consider them.

We will be serving deposition notices for the professors shortly. Because you have not provided their availability, we will choose the dates. If we need to move the dates later to accommodate the professors' schedules, we can do so.

Based on our prior discussions, we understand that Plaintiffs object to the depositions on the grounds of relevance and burden, and will not make the professors available without a Court order. If Plaintiffs have any objections that we have not already discussed, please tell us promptly. Amazon understands that the parties remain at an impasse and we will need to seek the Court's intervention.

Thanks,  
Jeremy

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**From:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>  
**Sent:** Friday, July 1, 2022 8:06 PM  
**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>  
**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>;  
[jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>  
**Subject:** RE: RPI v. Amazon

Li,

Plaintiffs' proposed 30(b)(6) designation of Dr. Hsu is not a proper basis to resist depositions of Professors Nirenburg, McShane, and Strzalkowski. As the Rule itself states, "[t]his paragraph (6) does not preclude a deposition by any other procedure allowed by these rules."

Your explanation of the alleged burden on these professors is too vague to inform us of the basis for Plaintiffs' objection to the depositions. If there are facts regarding burden that Plaintiffs plan to rely on to oppose Amazon's motion to compel the depositions, please disclose those to us now so we can consider them.

If Professor McShane's medical condition requires a reasonable accommodation to make the deposition more manageable for her, please let us know what sort of accommodation would be helpful to her.

Thank you,  
Jeremy

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**From:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>

**Sent:** Wednesday, June 29, 2022 7:07 PM

**To:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>

**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>; [jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** RE: RPI v. Amazon

Jeremy,

Plaintiffs plan on designating Dr. Cheng Hsu to testify regarding the following 30(b)(6) topics:

- Amazon's 30(b)(6) topic #13: "The state of the art in natural language processing before 2000."
- Amazon's 30(b)(6) topic #14: "Natural language processing research conducted at RPI after 2000."

We believe this designation should obviate the need for Amazon to depose Professors Strzalkowski, Nirenburg, and McShane. As discussed previously, these professors were not at RPI at the time of the invention, and they further do not have any knowledge about this case or about the '798 Patent.

All three professors have academic and professional commitments that will make it burdensome for them to attend a deposition. Professor Nirenburg, in particular, is the head of his department with substantial commitments. Professor McShane also has a medical condition that will affect her ability to sit for a deposition.

Separately, please find attached Plaintiffs' supplemental responses to Amazon's Interrogatories 15 and 16.

Best,

**Li Zhu** | Partner

**Robins Kaplan LLP | Silicon Valley**

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**From:** Zhu, Li

**Sent:** Monday, June 27, 2022 12:47 PM

**To:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>

**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>; [jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** RE: RPI v. Amazon

Jeremy,

Thank you. We will send you our responses this Wednesday. We will also send your our supplemental responses to Interrogatories 15 and 16 on the same day.

Best,

Li Zhu

Partner

**Robins Kaplan LLP**  
**Silicon Valley**

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**From:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>

**Sent:** Thursday, June 23, 2022 8:35 PM

**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>

**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>; [jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** [EXTERNAL] RE: RPI v. Amazon

Li,

We are awaiting Plaintiffs' responses to the questions below. Please get back to us by Tuesday, June 28.

Thanks,

Jeremy

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**From:** Jeremy.Anapol

**Sent:** Wednesday, June 8, 2022 3:01 PM

**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>

**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>; [jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** RE: RPI v. Amazon

Li,

Thanks for the call this afternoon. I write to memorialize our discussion. You informed me that your firm represents the three professors in connection with their employment at RPI. We discussed at least the following grounds of relevance for the requested depositions:

- Obviousness (e.g., state of the art as of the priority date, secondary considerations before and after the priority date)
- Enablement (e.g., state of the art before and after the priority date, subsequent experimentation after the priority date at RPI and elsewhere)
- Damages (e.g., prior approaches for achieving similar results, alternative approaches after the priority date, comparable licenses at RPI and elsewhere)

The professors' faculty profiles, publications, and LinkedIn profiles support these grounds. We also asked for Plaintiffs' position on the following:

- What burden is associated with making the professors available for deposition?
- If Plaintiffs contend that some 30(b)(6) designee will obviate the need to depose these professors, who are Plaintiffs planning to designate?
- Any compromise to which Plaintiffs would be amenable?

Please let us know Plaintiffs' position on these questions.

Best regards,  
Jeremy

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**From:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>  
**Sent:** Monday, June 6, 2022 8:21 PM  
**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>  
**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>; [jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>  
**Subject:** RE: RPI v. Amazon

Sounds good, let's talk at 2:00 PM on Wednesday. We can use the following conference line:

(877) 853 5257  
Meeting ID: 940 617 8704  
Meeting Password: 405767

Thanks,  
Jeremy

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**From:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>  
**Sent:** Monday, June 6, 2022 6:27 PM  
**To:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>  
**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>; [jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>  
**Subject:** RE: RPI v. Amazon

Hi Jeremy,

We are available to confer Wednesday between noon and 3 PM PST.

Best,

Li Zhu  
Partner  
**Robins Kaplan LLP**  
**Silicon Valley**  
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**From:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>  
**Sent:** Monday, June 6, 2022 11:34 AM  
**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>  
**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>;

[jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** [EXTERNAL] RE: RPI v. Amazon

Li,

Please let us know your availability to meet and confer tomorrow or Wednesday regarding the depositions of Dr. Nirenburg, Dr. Strzalkowski, and Dr. McShane.

Thanks,  
Jeremy

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**From:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>

**Sent:** Friday, June 3, 2022 2:37 PM

**To:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>

**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>;  
[jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** RE: RPI v. Amazon

Hi Jeremy,

Thank you for your confirmation re: AWS. We will follow up with you if we identify additional AWS services to be relevant during the course of discovery.

Please provide an update regarding the rest of Amazon's production pursuant to Dkt. No. 205.

Given Amazon's stated basis for seeking to depose Dr. Nirenburg, Dr. Strzalkowski, and Dr. McShane, we do not believe these depositions would provide relevant information proportional to the needs of the case, at this point in time. Let us know if you have additional reasons for seeking these depositions.

Best,

Li Zhu

Partner

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**From:** Jeremy.Anapol <[Jeremy.Anapol@knobbe.com](mailto:Jeremy.Anapol@knobbe.com)>

**Sent:** Friday, June 3, 2022 9:52 AM

**To:** Zhu, Li <[LZhu@RobinsKaplan.com](mailto:LZhu@RobinsKaplan.com)>; Huang, Annie <[AHuang@RobinsKaplan.com](mailto:AHuang@RobinsKaplan.com)>

**Cc:** AmazonVsRPI <[AmazonVsRPI@knobbe.com](mailto:AmazonVsRPI@knobbe.com)>; RK\_Dynamic <[RK\\_Dynamic@RobinsKaplan.com](mailto:RK_Dynamic@RobinsKaplan.com)>;  
[jpowers@hancocklaw.com](mailto:jpowers@hancocklaw.com); Mary L. D'Agostino <[mdagostino@hancocklaw.com](mailto:mdagostino@hancocklaw.com)>

**Subject:** [EXTERNAL] RE: RPI v. Amazon

Li,

Are Plaintiffs going to make Dr. Nirenburg, Dr. Strzalkowski, and Dr. McShane available for deposition? Please let us know by the close of business today so we can address these depositions with the Court on Monday, if necessary.